

John A. Moustakas, Esquire
LAW OFFICE OF BRIAN J. DUFFIELD
95 North Main Street
Mullica Hill, New Jersey 08062
Phone: (856) 478-9900 *Fax: (856) 478-6885
Attorneys for Creditor, Township of Logan

IN RE:

JIM BUNDALIAN and GRACE BUNDALIAN,

Debtors

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

CHAPTER 13
CASE NO. 07-15252 (GMB)

**NOTICE OF MOTION FOR RELIEF
FROM AUTOMATIC STAY PURSUANT
TO 11 U.S.C. §362(d)**

TO: The Honorable Judith H. Wizmur, U.S.B.J.
United States Bankruptcy Court
Federal Building & U.S. Courthouse
401 Market Street
Camden, New Jersey 08101

Steven R. Neuner, Esquire
750 Route 73 South
Marlton, NJ 08053

Isabel C. Balboa, Esquire
Chapter 13 Standing Trustee
535 Route 38, Suite 580
Cherry Hill, New Jersey 08002

**CERTIFICATION OF SERVICE OF THE
MOTION WITH THIS DATE IS REQUIRED
PRIOR TO THE HEARING DATE OR THE
MOTION WILL BE DENIED.**

U.S. BANKRUPTCY COURT
FILED
08 SEP 25 AM 9:33
JAMES J. MALDON
BY: *[Signature]*
DEPUTY CLERK

PLEASE TAKE NOTICE that the undersigned attorney for the creditor/movant, Township of Logan, shall move before the Honorable Judith H. Wizmur, United States Bankruptcy Judge, on the 20th day of October, 2008, at 10 A.M., or as soon thereafter as counsel may be heard for the following relief:

- A. For an Order providing relief from the Automatic Stay pursuant to 11 U.S.C. §362(d)(1) and/or (d)(2) for the creditor, Township of Logan, to permit its efforts to collect said taxes pursuant to Title 54 of the New Jersey statutes.
- B. For such other relief as is just and equitable.

PLEASE TAKE FURTHER NOTICE that all opposition to the Motion must be in writing and filed with the Clerk of the Court, with a copy served upon the creditor/movant's counsel, whose name and address are set forth above, within the time required by the rules governing the Court.

PLEASE TAKE FURTHER NOTICE that if written opposition is not timely filed and served this Motion shall be deemed uncontested and relief requested may be granted without the need for a hearing.

PLEASE TAKE FURTHER NOTICE that in support of the Motion, creditor/movant shall rely upon the annexed Certification of Beth A. Walls, Certified Tax Collector.

A proposed form of Order is filed and served herewith.

Creditor/Movant requests oral argument only if written opposition is timely filed and served.

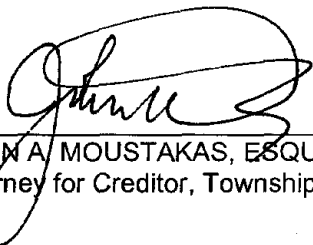
Dated: 9/23/08


JOHN A. MOUSTAKAS, ESQUIRE
Attorney for Creditor, Township of Logan

STATEMENT THAT NO BRIEF IS NECESSARY

No brief in support of the foregoing Motion is necessary as no novel or complex factual or legal issues are raised therein and the law and facts necessary for the resolution of said motion are within the sound discretion of this Court.

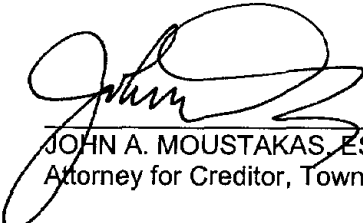
Dated: 9/23/08


JOHN A. MOUSTAKAS, ESQUIRE
Attorney for Creditor, Township of Logan

CERTIFICATION OF SERVICE

John A. Moustakas, Esquire hereby certifies that on 9/23/08, 2008 he caused true and correct copies of the foregoing Notice of Motion and all accompanying documents, including the Certification of Creditor in Support of Motion, a Proposed form of Order for Relief from the Automatic Stay, to be served by way of first class mail, postage pre-paid, to those parties addresses set forth on the attached service list.

Dated: 9/23/08


JOHN A. MOUSTAKAS, ESQUIRE
Attorney for Creditor, Township of Logan

LAW OFFICE OF
BRIAN J. DUFFIELD

www.lawyers-nj.com

BRIAN J. DUFFIELD

95 North Main Street
Mullica Hill, NJ 08062

JOHN A. MOUSTAKAS
EKATERINE N. ELEFTHERIOU

(856) 478-9900
FAX (856) 478-6955

September 23, 2008

Clerk, United States Bankruptcy Court
U.S. Bankruptcy Court
401 Market Street
Camden, New Jersey 08101-2067

Re: Jim and Grace Bundalian
Case No.: 07-15252 (GMB)
120 Robins Run East
Block 2702, Lot 8

ch 13

Dear Sir/Madam:

Enclosed please find the following:

1. Notice of Motion for Relief from Automatic Stay (O+1)
2. Certification of Beth A. Walls (O+1)
3. Proposed Order for Relief from Automatic Stay (O+2)
4. Check in the amount of \$150.00; and
5. Self-addressed stamped envelope
- 6.

Would you please:

1. File
2. Return filed copy

Very truly yours,

BY: 
JOHN A. MOUSTAKAS, ESQUIRE

JAM/frs
Enclosures

cc: The Honorable Judith H. Wizmur, U.S.B.J. (w/encls)
Steven R. Neuner, Esquire (w/encls)
Isabel C. Balboa, Esquire (w/encls)
Rosanne M. Pyle, Deputy Tax Collector, Township of Logan (w/

FILE NO. U.S. BANKRUPTCY COURT
08 SEP 25 AM 9:33
JAMES J. WALDRON
BY: DEPUTY CLERK

**UNITED STATES
BANKRUPTCY COURT**
DISTRICT OF NEW JERSEY
CAMDEN DIVISION

403722 - JL

September 25, 08
11:12:51

**STAY
07-15252**

Debtor.: JIM B. BUNDALIAN
Judge.: GLORIA BURNS
Amount.: \$150.00 CH
Check#.: 15774

Total -> \$150.00

FROM: BRIAN J. DUFFIELD
95 N. MAIN STREET
MULLICA HILL, NJ 08062